Exhibit 39

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY
CAMDEN VICINAGE

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IN RE: VALSARTAN, LOSARTAN, AND IRBESARTAN PRODUCTS LIABILITY LITIGATION	:	MDL NO. 2875
	:	CIVIL NO. 19-2875 (RBK/JS)
THIS DOCUMENT APPLIES TO ALL CASES	:	HON. ROBERT B. KUGLER

- CONFIDENTIAL INFORMATION -
SUBJECT TO PROTECTIVE ORDER

VOLUME I

- - -

May 27, 2021

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Videotaped remote deposition of JUN DU, taken pursuant to notice, was held via Zoom Videoconference, beginning at 9:16 a.m., EST, on the above date, before Michelle L. Gray, a Registered Professional Reporter, Certified Shorthand Reporter, Certified Realtime Reporter, and Notary Public.

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Q. Do you have an office in China, at any of ZHP's offices in China?
A. No, I don't.
Q. Do you have a laptop computer?
A. That is correct, I do.
Q. Do you use the laptop for work?
A. That is correct. I do use my personal laptop computer for work.
Q. Was that laptop -- rephrase.
What brand of laptop is it?
A. It is an Apple MacBook.
Q. How long have you had that laptop?
A. I believe I have been using it since 2015 also. I do not recall the exact year.
Q. Was that laptop provided to the third party that swept the -- rephrase.
Was that laptop provided to the third party so the documents and information could be provided to us?

After such an audit was complete, then my title as such, or my assignment, would be considered complete.

Q. When was that?

A. Those were merely interim assignments. Whenever Baohua Chen as the general manager was unavailable, someone was needed for the coordination.

Q. When were those interim assignments as you've described them?

A. I did not catch the first word of your question.

Q. When were those interim assignments as you described them?

A. More specifically, those assignments were during the audits conducted by either the FDA or the European Union. Since there were many audits conducted by the FDA in the past, I cannot tell you the specific dates for each of such assignments.

Q. Was one of those assignments in July and August of 2018?

A. That is correct.

Zoom --

MR. SLATER: Can we get that up on the screen please. Great.

This is 430. This may have been marked in other depositions. I don't want to overlap. I don't want to make a mistake. We'll call it Exhibit 430.

THE WITNESS: Can you just give me a second to review this document quickly?

MR. SLATER: Again, for my team, let's just keep track of the time and then we'll see how long it goes. And if there's an issue later, please.

THE WITNESS: I'm done.

BY MR. SLATER:

Q. Exhibit 430 is a letter that you wrote to the FDA in your capacity as executive vice president of ZHP, correct?

A. I did not write this letter.

Q. Exhibit 430 is a letter that you signed in your capacity as executive

vice president of ZHP, correct?

A. That is correct. I signed this letter on behalf of ZHP.

Q. Did you read the letter before you signed it?

A. I did not completely review this letter. This letter was completed by the QA department, QC department, technology department, and analytical department of ZHP. As the contact person for the FDA, I signed this letter on behalf of our company.

Q. When you say you did not completely review this letter, is it your testimony that before you signed the letter, which you knew was going to the FDA, you didn't read the entire letter?

A. That is correct, I did not.

I trust in the professional expertise of our team. Besides, I did not have the GMP knowledge at that time.

Q. Do you know who specifically wrote this letter, what people?

A. As in my prior statement it

was the QA department, QC department, technology department, and the manufacturing department was their related stuff.

Q. Do you know which specific people wrote the letter, not what departments, but which specific people?

A. I believe I know the leader or leaders of their team.

Q. Do you know which specific people wrote this letter?

A. For the QA team, the leader was Jucai Ge, spelled as J-U-C-A-I, last name G-E. For the QC team, their leader for Min Li, M-I-N, last name L-I, and Qiangming Li, spelled as Q-I-A-N-G-M-I-N-G, last name L-I. For the regulatory affairs team, the leader was Linda Lin. And the technology and manufacturing team, the leader was Peng Dong spelled as P-E-N-G, last name D-O-N-G.

Q. Before you signed this letter, did you ask those people if the

letter was fully accurate?
A. When I was signing this letter, I asked them whether all the 483 related materials were complete and the answer was affirmative.
Q. This letter was sent to the FDA as a response to the FDA 483 observations from the July 23rd to August 3, 2018 inspection, correct?
A. That is correct.
Q. That inspection resulted from the disclosure to the FDA that there was NDMA in ZHP's valsartan API, correct?
MR. GOLDBERG: Objection to form. Speculation.
THE INTERPRETER: The interpreter would like to clarify with the witness.
THE WITNESS: This FDA on-site inspection is a so-called for-cause inspection.
BY MR. SLATER:
Q. The cause was the disclosure to the FDA that there was NDMA in ZHP's